

Exhibit 4

In the Matter Of:

Hammons vs University of Maryland Medical System

1:20-CV-02088-DKC

EVEREST SCOTT CONOVER

April 13, 2022



ESQUIRE
DEPOSITION SOLUTIONS

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EVEREST SCOTT CONOVER
Hammons vs University of Maryland Medical System

April 13, 2022

1

1 UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

3 -----x

4 JESSE HAMMONS,)

5 Plaintiffs,) Case No.:

6 V.) 1:20-CV-02088-DKC

7 UNIVERSITY OF MARYLAND MEDICAL)

8 SYSTEM CORPORATION, ET AL.,)

9 Defendants.)

10 -----x Pages 1-64

13 REMOTE VIDEOTAPED DEPOSITION OF

14 EVEREST SCOTT CONOVER

15 Wednesday, April 13, 2022

16 Towson, MD

20 Reported by: Sherry L. Brooks

21 Certified LiveNote Reporter

22 Job No. J8078717

April 13, 2022

11:30 a.m.

Remote Videotaped deposition via Zoom

videoconferencing of Everest Scott Conover at:

Towson, MD

Pursuant to notice, before Sherry L. Brooks,
Certified LiveNote Reporter and Notary Public, in and
for the State of Maryland.

1 ON BEHALF OF PLAINTIFF:

2 Jonathan S. Z. Hermann, Esquire

3 Joshua M. Goldman, Esquire

4 1133 Avenue of the Americas

5 New York, NY 10036

6 (212) 336-2000

7 E-mail: JHermann@pbwt.com

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9
10 ON BEHALF OF DEFENDANTS:

11 Hannah Wigger, Esquire

12 Sheppard Mullin

13 2099 Pennsylvania Avenue, NW

14 Suite 100

15 Washington, DC 20006

16 (202) 747-1900

17 E-mail: HWigger@SheppardMullin.com

18
19 ALSO PRESENT:

20 George Ellis, Videographer

C O N T E N T S

EXAMINATION OF EVEREST SCOTT CONOVER	PAGE
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BY MR. HERMANN	6
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EXHIBITS	PAGE
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Exhibit 1 Catholic Identity Agreement	31
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Exhibit 2 Second Amended and Restated Operating	40
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Agreement	
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Exhibit 3 Catholic Identity Committee Minutes	46
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Exhibit 4 Email Dated 1/24/20 - Ben Vanlandingham	50
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(Exhibits attached to the transcript.)

P R O C E E D I N G S

- - -

11:30

THE VIDEOGRAPHER: We are now on the record. The time is 11:30 a.m. Eastern Standard Time on April 13th, 2022. This begins the videoconference deposition of Scott Conover taken in the matter of Jesse Hammons versus the University of Maryland Medical System Corporation, et al. filed in the United States District Court for the District of Maryland. The Case Number is 1:20-CV-02088-DKC.

11:30

My name is George Ellis. I'm the remote videographer. The court reporter is Sherry Brooks. We are representing Esquire Deposition Solutions.

11:31

Counsel, will you please state your name and who you represent, after which, the court reporter will swear in the witness.

11:31

MR. HERMANN: Good morning. John Hermann, Patterson Belknap Webb & Tyler for the plaintiff, Jesse Hammons.

11:31

MS. WIGGER: Good morning. My name is Hannah Wigger from Sheppard Mullin. I represent defendants.

11:31

1 - - - 11:31

2 This videotaped deposition is being held 11:31
3 via videoconferencing equipment. The witness and
4 reporter are not in the same room. The witness has
5 been sworn in remotely pursuant to agreement of all
6 parties. The parties stipulate that the testimony is
7 being given as if the witness was sworn in person.

8 * * * * * 11:31

9 EVEREST SCOTT CONOVER 11:31

10 was called for re-examination by counsel and, after 11:31
11 having been duly sworn by the Notary, was examined
12 and testified as follows:

13 EXAMINATION BY COUNSEL FOR DEFENDANT 11:31

14 BY MR. HERMANN: 11:31

15 Q. Good morning. Could you please state your 11:31
16 name for the record?

17 A. Sure, Everest Scott Conover. 11:31

18 Q. Good morning, Mr. Conover. 11:31

19 A. Good morning. 11:31

20 Q. Mr. Conover, have you ever been deposed 11:31
21 before?

22 A. I have not. 11:31

1 Q. Are you familiar with the history of Saint 11:54
2 Joe's?

3 A. I am. I mean, again, in general terms. 11:55

4 Q. Sure. Do you know when it was founded? 11:55

5 A. 1864. 11:55

6 Q. And it was founded as a private Catholic 11:55
7 hospital, right?

8 A. It was. 11:55

9 Q. Owned by the Catholic church? 11:55

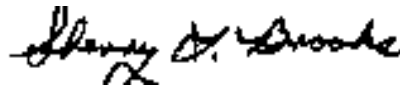
10 A. I don't know the official ownership 11:55
11 structure. I believe that the Sisters of St.
12 Francis, which is a Catholic order, came from
13 Philadelphia to Baltimore and founded the hospital
14 here in Baltimore in 1864.

15 But I don't know the series of ownerships 11:55
16 and -- you know, that led up to Catholic Health
17 Initiatives owning Saint Joe's and being the entity
18 that sold Saint Joe's to the University of Maryland
19 Medical System. I don't have that particular
20 ownership history in terms of the legacy of the
21 ownership.

22 Q. Sure. You mentioned the Catholic Health 11:56

1 CERTIFICATE OF NOTARY PUBLIC

2 I, SHERRY L. BROOKS, a Notary Public in
3 and for the STATE OF MARYLAND, before whom the
4 foregoing deposition was taken, do hereby certify
5 that the witness whose testimony appears in the
6 foregoing deposition was duly sworn by me; that the
7 testimony of said witness was taken by me in
8 Shorthand at the time and place mentioned in the
9 caption hereof and thereafter transcribed by me; that
10 said deposition is a true record of the testimony
11 given by said witness remotely via Zoom
12 videoconferencing; that I am neither counsel for,
13 related to, nor employed by any of the parties to the
14 action in which this deposition was taken; and
15 further, that I am not a relative or employee of any
16 counsel or attorney employed by the parties hereto,
17 nor financially or otherwise interested in the
18 outcome of this action.

19 

20 SHERRY L. BROOKS
21 Notary Public in and for
STATE OF MARYLAND

22 My commission expires: July 9, 2023

EVEREST SCOTT CONOVER
Hammons vs University of Maryland Medical System

April 13, 2022
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ACKNOWLEDGMENT OF DEPONENT

ASSIGNMENT NO.: J8078717

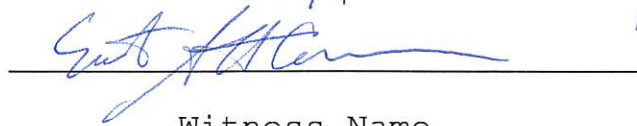
CASE CAPTION: JESSE HAMMONS - V - UNIVERSITY OF
MARYLAND MEDICAL SYSTEM CORP., ET AL.

DEPONENT: EVEREST SCOTT CONOVER

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I
have read the entire transcript of my Deposition
taken in the captioned matter or the same has been
read to me, and the same is true and accurate, save
and except for changes and/or corrections, if any, as
indicated by me on the DEPOSITION ERRATA SHEET
hereof, with the understanding that I offer these
changes as if still under oath.

Signed on the 17th day of May, 2022.



Witness Name